

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC

§

v.

§

Case No. 2:20-CV-0280-JRG

VERIZON COMMUNICATIONS INC., ET
AL.

§

§

UNOPPOSED MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff KAIFI LLC (“KAIFI”) respectfully files this Unopposed to Amend the Docket Control Order and would show the Court the following:

KAIFI respectfully requests that the following deadlines be extended:

Deadline	Proposed Deadline	Event
October 22, 2021	November 8, 2021	Deadline to Complete Expert Discovery
October 8, 2021	October 15, 2021	Serve Disclosures for Rebuttal Expert Witnesses
September 17, 2021	September 24, 2021	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
September 10, 2021	September 17, 2021	Deadline to Complete Fact Discovery and File Motions to Compel Discovery
September 1, 2021		Comply with P.R. 3-7 (Opinion of Counsel Defenses)

These extensions will not affect any other deadlines in the docket control order.

WHEREFORE, Plaintiff respectfully requests that the Court extend the deadlines above and enter the attached amended docket control order.

Dated: August 25, 2021.

Respectfully submitted,

/s/ Robert Christopher Bunt

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Attorneys for Plaintiff KAIFI LLC

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on August 25, 2021 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), Counsel for Plaintiff Prashanth Chennakesavan meet and conferred with Counsel for Defendants Kevin Anderson on August 23, 2021 regarding the above referenced motion. Verizon Defendants are unopposed to the above motion.

/s/ Robert Christopher Bunt
ROBERT CHRISTOPHER BUNT